

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

IN RE:	§	CHAPTER 13
	§	
EVONN DENISE HANSEN	§	
	§	
DEBTOR	§	CASE NO. 13-51060 GAG

**WILLIS HANSEN'S OBJECTION TO  
CONFIRMATION OF DEBTOR'S AMENDED CHAPTER 13 PLAN**

TO THE HONORABLE COURT:

Now comes Willis Hansen and files this Objection to Confirmation of Debtor's Amended Chapter 13 Plan ("Plan") dated June 19, 2013, and in support thereof would respectfully show the Court as follows:

1. Willis Hansen is the maker and co-maker of several debts listed on debtors schedule "F"
2. Movant and Debtor divorced October 26, 2012.
3. In the parties' "Agreed Final Decree of Divorce" Debtor agreed to and accepted financial responsibility for 44.29% (\$61,527.95) of the debts listed in the attached spreadsheet herein referred to as Exhibit "A"
4. Debtor listed debts as to which she is not a co-maker or authorized user with the intent to discharge debt she previously agreed and was ordered to pay per her divorce decree.
5. Debtor has failed to list *all* disposable household income on schedule "I". Movant asserts that debtor has sufficient monthly disposable income to increase her plan payment and pay 100% of all unsecured and secured debts.
6. Movant objects to Debtor's attempt to protect \$9,793.09 listed as an asset on schedule "B". The asset should be listed as "disposable income" on schedule I to be used to pay unsecured creditors.
7. Movant further asserts that Debtor has failed to maintain current monthly direct payments to USAA which is directly affecting Movant's credit standing.

8. The debts made the subject hereof are non-dischargeable per 11 U.S.C. Sec.

523(a) (15) in the absence of completion of all Plan payments.

WHEREFORE, based on the foregoing, Willis Hansen respectfully requests that this Honorable Court enter an order denying confirmation of the Debtor's Plan unless Debtor amends her plan to reflect 100% payment to unsecured and secured debts as to which Movant is the maker or co-maker. Movant further requests that for the time and effort expended in filing this motion, Movant be awarded \$900.00 in attorney fees.

Respectfully submitted,

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W. Stephen Graves  
State Bar No. 08313010  
GRAVES LAW FIRM  
105 HOWARD ST.  
SAN ANTONIO, TEXAS 78212  
TELEPHONE: (210) 738-3230  
TELEFAX: (210) 738-3195

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Willis Hansen's Objection to Confirmation of Debtor's Amended Chapter 13 Plan was served this 20<sup>th</sup> day of July, 2013, by First Class Mail upon the following:

Mary K. Viegelaahn  
Chapter 13 Trustee  
909 N.E. Loop 410, Suite 400  
San Antonio, Texas 78209

Evonn Denise Hansen  
10723 Apple Springs  
Universal City, TX 78148  
Debtor

Rick Flume  
Flume & Associates  
8700 Crownhill Blvd., Suite 502  
San Antonio, Texas 78209  
Attorney for Debtor